

B1 (2) On page 2, in lines 1-2, please delete "08/942,209, with a Notice of Allowance issued therefor" and substitute therefor -/08/942,263, and now U.S.

Patent No. 6,012,065, -/.

B2 (3) On page 2, in line 5, after "08/942,262," please insert -/and now U.S. Patent

No. 6,078,889, -/.

B3 (4) On page 2, in line 9, after "08/942,260," please insert -/and now U.S. Patent

No. 6,018,725, -/.

Remarks

(1) Claims 1-8 remain in the subject application. Claims 9 and 10 have been appended to the subject application.

(2) The applicants have made corrections to errors/changes in the Specification of which the applicants have become aware.

(3) In the present Office Action, dated June 7, 2000, the Examiner has indicated that the applicants, in responding to the previous Office Action, had incorrectly indicated that the subject application serial number was 08/837,829 instead of properly recording 08/942,264. The applicants respectfully thank the Examiner for identifying the error. The applicants have correctly stated the application serial number hereinabove.

(4)(a) In the present Office Action, the Examiner has rejected claims 1-10 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,293,310 issued March 8, 1994 to Carroll et al. (hereinafter referred to as "*Carroll*") in view of U.S. Patent No. 6,047,267 issued April 4, 2000 to Owens et al. (hereinafter referred to as "*Owens*").

It should be noted that *Carroll* is assigned to the assignee of the present invention and that Terri A. Carroll and Jacques E. Hasbani are inventors in common.

In rejecting claim 1, the Examiner stated that:

... Carroll teaches the invention substantially as claimed, comprising the steps: ... (b) uploading a set of data from the client data processing system to the host data processing system (col. 6, lines 57-59);

The applicants respectfully submit that the Examiner has imputed characteristics and properties to *Carroll* that were neither contemplated nor taught by *Carroll*.

Carroll, in column 6, lines 57-59, teaches that a representative of the carrier forwards an order form to a data center. The process of forwarding can be completed via a transmission medium such as facsimile. Upon receipt of the order form, the data center verifies the authority of the sender and, upon approval, must

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then convert the data contained in the order form into an appropriate update format. The process of *Carroll* is not the process of the instant application.

The applicants' claimed invention transfers object tables from a client to a host; the process is transparent to a system user. Indeed, a system user would be incapable of locating an object and transferring it anywhere. Further, the data of Carroll must be parsed in some form by the data center; this is not equivalent to the uploading of an object table that comprises objects that further comprise a set of functions performed by the object.

The use of objects to carry data, store instructions, provide functionality, and establish their own interface through stored instructions provides value to objects that was never possible with stored table data such as is found in *Carroll*. Additionally, *Carroll* neither taught nor disclosed that a set of data objects within a Data Access System could be updated; this fundamental element is part of the applicants' preamble to claim 1 because the object oriented programming environment, which was never contemplated by *Carroll*, serves as the basis for the data processing environment of the applicants' claimed invention. If *Carroll* neither taught nor even suggested that object oriented programming was possible, let alone that it was advantageous in saving time and memory resources within its host system, then *Carroll* cannot support the Examiner's premise that *Carroll* teaches the invention substantially as claimed.



The applicants respectfully submit that *Carroll* never uploaded object tables as is claimed in the applicants' claim 1(b) because *Carroll* was not designed to do anything with objects or to function within an object oriented environment. And, clearly objects and table data are not analogous. Therefore, if *Carroll* could not use the objects, then *Carroll* had no need to upload object tables.

In rejecting claim 1, the Examiner further stated that:

... Carroll teaches the invention substantially as claimed, comprising the steps: ... (c) reading the set of object tables at the host data processing system (read input file, 210 of fig. 13; col. 6, lines 65-68);

The applicants respectfully submit that *Carroll* neither taught nor suggested that reading the set of object tables of the applicants' claimed invention was possible; and, even if *Carroll* could read the object tables, *Carroll* would have not been able to do anything with the objects because *Carroll* could not function within an object oriented environment. Additionally, the reading of an input file (as described in *Carroll*) is not analogous to reading object files. An input file, as taught by *Carroll*, contains rate data (or the like), upgrades or modifications that are added to pre-existing files that can be accessed to determine specific rates for a transaction under specific circumstances (*Carroll* at column 13, lines 32-41). An object table, on the other hand, stores objects that are to be utilized not only for their data content, but for the functionality they contain (Specification at page 7, lines 25; and, at page 18, lines 13-23).

In rejecting claim 1, the Examiner additionally stated that:

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... Carroll teaches the invention substantially as claimed, comprising the steps: ... (d) determining which data objects in the set of object tables is to be updated (load update 220 of fig. 13) and further determining which data objects in the set of object tables is to be maintained (reject update 224 of fig. 13); (e) constructing a new set of object tables from the host data processing system to the client data processing system (update format to be sent to the user station 10, col. 7, lines 2-24); (f) transmitting the new set of object tables from the host data processing system to the client data processing system (update format to be sent to the user station 10, col. 7, lines 2-24); (g) verifying accurate receipt of the new set of object tables at the client data processing system (check to ensure the update information, col. 7, lines 21-24); and (h) restarting the client data processing system (user 10 will load the update information into the system, col. 7, lines 19-21).

The applicants respectfully submit that the properties attributed to *Carroll* by the Examiner are simply not possible within the limited data structures available to *Carroll*; and, specifically with respect to element 1(g), *Carroll* does not teach the accurate receipt of a new set of object tables at the client data processing system. Rather, *Carroll* merely teaches that the user station will check to ensure that the update information is authorized, not that it is accurate (*Carroll* at column 7, lines 19-30).

As *Carroll* does not explicitly teach the applicants' preamble, or any of elements 1(b), 1(c), 1(d), 1(e), 1(f), or 1(g), the Examiner has proposed that it would have been obvious to one of ordinary skill in the art to add the object oriented database of *Owens* into the data processing system of *Carroll* to accomplish what the applicants have done.



In rejecting claim 1 under 35 U.S.C. §103(a), the Examiner further stated that "Owens teaches mapping data according to an object-oriented scheme to [store] data in persistent memory according to a relational database scheme so that the object-oriented scheme generated by a user may be efficiently stored ..." (fig. 6; col. 2, lines 42-43).

The applicants respectfully agree that *Owens* teaches an object oriented programming environment in which an object oriented database defines payment resources; however, the presence of an object oriented environment is where the similarity with the applicants' present invention ends.

Owens defines the object to be stored within the *Owens* system as:

a container object that allows a user to define new payment resources without requiring the user to redesign a relational database system used for persistent storage of transaction information. An object server maps data that is represented in transient memory according to an object-oriented scheme to [store] data that is represented in persistent memory according to a relational database scheme. (*Owens* at col. 2 line 63 through col. 3, line 13.)

Whereas, the object environment of the applicants' claimed invention is specifically limited to a system wherein the client transmits its set of object tables to a host for updating and wherein the updated object tables form the basis of a new set of tables to be transmitted back to the client. *Owens* does not teach that objects within the database can be presented, updated, recreated, and then



retransmitted back to the originator. *Owens* is merely concerned with storage (*Owens* at column 7, lines 32-44).

The applicants respectfully submit that the Examiner has not established a prima facie case of obviousness as is required under §103.

To establish a prima facie case of obviousness under §103, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. (*MPEP* at 2142 and 2143). The teaching or suggestion to make the claimed invention and the reasonable expectation of success must both be found in the prior art, not in applicants' disclosure. (*MPEP* at 2143).

The applicants' present application cannot, therefore, be obvious over *Carroll* in view of *Owens* because neither reference alone nor together with the knowledge generally available teaches nor suggests the applicants' claimed invention; it also would not be obvious to one of ordinary skill in the art to modify *Carroll* and/or *Owens* to achieve what the applicants have achieved. And, even if one of ordinary skill in the art were motivated to modify *Carroll* and/or *Owens*, the result would not be the applicants' claimed invention as per the Remarks made hereinabove or absent impermissible hindsight. The result would be a rating scheme storing one or more objects that contains data but no enabling functionality or the interface capability necessary to implement the functionality within a carrier management system. Therefore, the applicants submit that the applied references



do not provide the necessary suggestion to modify and/or combine their teachings as per the above Remarks; thus, the claimed invention can not be considered obvious over such a modification or combination in the absence of such a suggestion.

Claims not specifically discussed above are believed allowable at least for the reasons advanced with respect to the claims from which they depend. Therefore, the applicants respectfully submit that the Examiner's rejection of claims 1-5 under 35 USC §103(a) is traversed by the Remarks made hereinabove.

(4)(b) In rejecting claim 6, the Examiner further stated that:

... Carroll teaches the invention substantially as claimed, comprising: (a) a client data processing system (10 of fig. 1; fig. 6); (b) a host data processing system (12 of fig. 1; 30 of fig. 6); (c) a data access system for storing and managing a plurality of object files (data center 14 of fig. 1; col. 7, lines 2-18, 47-62, storing and managing a plurality of object files, fig. 3-5); (d) communication means for linking the client data processing system with the host data processing system (see communication link between the carrier 1 and the user 1 through data center 14 of fig. 1); (e) first memory means for storing the plurality of object files (customized configuration database, 42 of fig. 9; col. 10, lines 26-50) and second memory means for predetermined set[s] of object files (discounts database and surcharges database, 44 and 46 of fig. 9; col. 10, lines 26-50).

The applicants incorporate the arguments raised in the Remarks hereinabove with respect to the rejection by the Examiner of claims 1-5 under §103(a).



Claims not specifically discussed above are believed allowable at least for the reasons advanced with respect to the claims from which they depend. Therefore, the applicants respectfully submit that the Examiner's rejection of claims 6-10 under 35 USC §103(a) is traversed by the Remarks made hereinabove.

(5) In view of the above Amendments and Remarks, the applicants submit that the subject application is in condition for allowance, and further examination and reconsideration are respectfully requested.

Respectfully submitted,



Paul A. Levitsky
Attorney for the Applicant(s)
Reg. No. 46,449

PITNEY BOWES INC.
Intellectual Property & Technology Law Dept.
35 Waterview Drive
Shelton, CT 06484-8000
Telephone: (203) 924-3845

